



# Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency  
Region 10 – Seattle, WA

## *Clean Air Act Full Compliance Evaluation Inspection Report*

### **Addison Collision Repair Twin Falls, ID 83301**

**Inspection Date: July 19, 2022**

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Report Author Signature

Date

Bryan Lange  
U.S. Environmental Protection Agency, Contract Inspector  
Eastern Research Group

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Peer Review Signature

Date

Elly Walters  
CAA/TRI Enforcement Officer  
EPA Region 10

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Section Chief Signature

Date

Derrick Terada  
ATES Section Chief  
EPA Region 10

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### Attachments

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## 1. Basic Facility and Inspection Information

Facility: Addison Collision Repair  
1196 Addison Avenue West  
Twin Falls, ID 83301

AFS/FRS Number: Not available

State Facility ID: 083-00144

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to Construct No. P-2012.0028, dated June 20, 2012

Facility Contacts: Joe Nalder  
Manager  
Addison Collision Repair  
(208) 736-4500  
[jamie@addisoncollision.com](mailto:jamie@addisoncollision.com)

Inspectors: Bryan Lange  
U.S. Environmental Protection Agency, Contract Inspector  
Eastern Research Group  
1600 Perimeter Park Drive  
Morrisville, NC 27560  
(919) 622-2374  
[Bryan.Lange@erg.com](mailto:Bryan.Lange@erg.com)

Heidi Orr  
Air Quality Compliance Officer  
Idaho Department of Environmental Quality  
Twin Falls Regional Office  
(208) 737-3873  
[Heidi.Orr@deq.idaho.gov](mailto:Heidi.Orr@deq.idaho.gov)

Date of Inspection: July 19, 2022

Inspection Start/End Times: July 19, 2022, 2:05 pm – 2:50 pm MST

Inspection Notice: This was an announced inspection.

Ms. Orr notified Mr. Nalder, by phone on July 18, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with the Permit to Construct (PTC) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

## **Disclaimer**

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

### **1. Facility/Process Description:**

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

Addison Collision Repair is a refinishing operation that repairs and paints automobiles. It has two paint booths. The facility does not paint complete cars, but repairs panels damaged in a collision. The emission sources located at the facility included the following:

- Mixing room,
- Spray booths,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

### **2. Compliance History**

November 21, 2018, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Addison Collision Repair is not registered in EPA's ECHO as of the date of this report.<sup>1</sup>

### **3. Records Review Prior To The Inspection**

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- June 20, 2012 - PTC No. P-2012.0028 and statement of basis.
- November 21, 2018 - Idaho inspection report documenting an on-site inspection.

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<sup>1</sup> See <https://echo.epa.gov/>

- November 28, 2018 - Example petition of exemption for the subpart HHHHHH NESHAP. The petition forms blanks were populated and signed by Jared Povey.

**a. Entry and Opening Conference**

Mr. Lange and Ms. Orr (“the inspectors”) arrived at the facility at approximately 2:05 pm MST on July 19, 2022. They entered the customer lobby and met with Joe Nalder. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA permit inspection. The opening conference included a discussion of operations.

Mr. Nalder explained that the process description include in the PTC should be updated. Specifically, the water wall paint booth had been converted to a semi-down draft booth. The water wall caused corrosion. Mr. Nalder volunteered information about Addison Collision Repair’s surface coating activities. Since 2014, the facility has only used solvent based paint for the topcoat and all other coatings are water-based. This change has reduced the amount of VOC used on-site.

The inspectors explained that the inspection would consist of a review of the PTC conditions followed by a walk-through where records will be reviewed.

The inspectors also explained that following the walk-through, Idaho DEQ will leave the facility with a carbon copy of an Air Quality Compliance Inspection - Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Ms. Orr will keep the original.

The opening conference concluded with a discussion of procedure to document odor controls. Mr. Nalder indicated that no odor complaints had occurred in the past 5-years.

**4. Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart 6H)**

Consistent with the subpart HHHHHH exemption petition on file, Mr. Nalder indicated that the coating materials used on-site do not contain the target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium).

**5. Permit to Construct Conditions**

To determine if the facility is in compliance with the VOC and PM<sub>10</sub> emission limits included in the PTC the inspectors reviewed paint consumption records and discussed spray booth filter system maintenance procedures.

Compliance with VOC emission limits are demonstrated with the coating material use limit. Specifically, the use rates shall not exceed 4.0 gallons per day for all coating materials. Mr. Nalder provided paint consumption totals for three random dates chosen by the inspectors.

	6/21/2022	4/1/2022	1/17/2022
Total daily paint consumption (gallons)	3.22	2.26	1.78

Mr. Nalder explained the paint booth floor exhaust filter replacement procedures. The glass fiber filters are replaced weekly. Consistently flow is necessary for a quality finish on the automobiles. Mr. Nalder provided a manufacture specification that guaranteed 98.81% particulate removal. This removal satisfies the filter system PTC operating requirement.

## **6. Facility Walk-Through and On-Site Records Review**

At approximately 2:25 pm MST, the inspectors were escorted to the automobile paint and repair area.

The inspectors observed dozens of paints in the storage area. Ms. Orr selected a paint at random and Mr. Nalder produced the SDS sheet. Neither silicon dioxide nor the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) were present in a measurable quantity.

The inspectors observed that each paint gun used for the applications of coatings was high volume-low pressure. Mr. Nalder indicated that each paint booth contained a natural gas fired heater and the total heat input capacity all space heaters was less than 10 MMBtu/hr.

The walk-through ended at approximately 2:40 pm MST.

## **7. Closing Conference**

At approximately 2:40 pm MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records observed by the inspectors. Mr. Lange went through his inspection notes and explained that there were no areas of concern from the inspection.

Ms. Orr presented Mr. Nalder with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance at the time of the inspection.

The inspectors departed the facility at 2:50 pm MST.

There are no post inspection activities related to the July 19, 2022, inspection.